UNITED STAT	TES OF AM	ERICA	:	
V STEDLIEN EL 1			:	CRIMINAL NO. 11-519
STEPHEN ELI	L18		•	
ORDER				
AND NO	OW, this	day of		, 2012, upon consideration of
Defendant Steph	nen Ellis's M	otion for Ten	nporary I	Return of Passport and Permission to go to
Aruba for a Fam	ily Vacation	and the resp	onse of tl	ne United States of America, it is ORDERED
and DECREED	that:			
1. S	Stephen Ellis is permitted to go to Aruba with his family from February 24, 2013			
until March 10,	2013 and			
2. T	The Clerk of Courts is to return Stephen Ellis's passport for the duration of his			
vacation.				
			BY T	HE COURT:
				J.

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 11-519

STEPHEN ELLIS

#### <u>DEFENDANT STEPHEN ELLIS'S MOTION FOR TEMPORARY RETURN OF</u> PASSPORT AND PERMISSION TO GO TO ARUBA FOR A FAMILY VACATION

Defendant Stephen Ellis, by and through his attorney Michael T. van der Veen, Esquire, respectfully requests this Honorable Court to grant Defendant permission to go to Aruba for a family vacation and to return Defendant's passport for the duration of the vacation and in support thereof represents the following:

- 1. On September 14, 2011, a federal grand jury returned an Indictment for United States v. Stephen Ellis, Criminal No. 11-519.
- 2. Defendant Stephen Ellis was arrested on September 29, 2011 and surrendered his passport subsequent to his arrest.
- 3. Defendant Stephen Ellis and Assistant United States Attorney Faithe Moore Taylor reached a plea deal in the case where Defendant will plead guilty.
- 4. Defendant Stephen Ellis and his family own a timeshare at the Marriott Resort in Palm Beach, Aruba.
- 5. Defendant Stephen Ellis is married with two children: Ryann Ellis who is 6 years old and Ashley Ellis who is 9 years old.
- 6. Defendant Stephen Ellis's timeshare period for this year runs from February 24, 2013 until March 10, 2013.

- 7. Defendant Stephen Ellis respectfully requests permission to go to Aruba for a family vacation from February 24, 2013 until March 10, 2013.
- 8. Defendant Stephen Ellis respectfully requests the return of his passport for the duration of his vacation.
- 9. Charles Meissler and Phil Harris of the United States Pretrial Services do not oppose Defendant Stephen Ellis's request.
- 10. Assistant United States Attorney Faithe Moore Taylor does not oppose Defendant Stephen Ellis's request.

WHEREFORE, Defendant Stephen Ellis respectfully requests this Honorable Court to grant Defendant permission to go to Aruba for a family vacation and to return Defendant's passport for the duration of his vacation.

Respectfully submitted,

Michael T. van der Veen, Esquire Attorney Identification No. 75616 Kats, van der Veen & Associates 1 Bustleton Pike Feasterville, PA 19053 215-396-9001 Attorney for Defendant Stephen Ellis

UNITED STATES OF AMERICA :

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CRIMINAL NO. 11-519

STEPHEN ELLIS

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#### **VERIFICATION**

I, the undersigned attorney for Defendant, hereby verify that the statements made in the foregoing Motion are true and correct to the best of my knowledge, information and belief.

I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Michael T. van der Veen, Esquire Attorney Identification No. 75616 Kats, van der Veen & Associates 1 Bustleton Pike Feasterville, PA 19053 215-396-9001 Attorney for Defendant Stephen Ellis

DATED: January 2, 2013

UNITED STATES OF AMERICA :

 $\mathbb{V}$ .

CRIMINAL NO. 11-519

STEPHEN ELLIS

#### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion to has filed electronically and is available for viewing and downloading from the ECF system.

Respectfully submitted,

Michael T. van der Veen, Esquire Attorney Identification No. 75616 Kats, van der Veen & Associates 1 Bustleton Pike Feasterville, PA 19053 215-396-9001 Attorney for Defendant Stephen Ellis

DATED: January 2, 2013